

EXHIBIT 5

GREGORY ANGLIN
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

DEAN OBEIDALLAH,)
)
Plaintiff,)
)
vs.) Case No.
)
ANDREW B. ANGLIN, et al.,) 2:17 CV 720
)
Defendants.)

Wednesday, October 31, 2018

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██████████
██████████
DEPOSITION OF GREGORY ANGLIN

Jackie Olexa White

Registered Merit Reporter

Job No. 150002

1 GREGORY ANGLIN

2 asked -- he told me he had a subpoena. I said, can 09:00:49
3 you meet at my office in an hour, and he said yes, 09:00:52
4 and we did. 09:00:55

5 Q. What is your office address? 09:00:56

6 A. It's 6827 North High Street, Suite 121, 09:01:02
7 Worthington, Ohio. 09:01:06

8 Q. Do you share that office space with 09:01:08
9 anybody? 09:01:09

10 A. My particular office Suite? 09:01:13

11 Q. Yes, sir, Suite 121. 09:01:15

12 A. There are some other counselors there, 09:01:17
13 yes. 09:01:19

14 Q. What business is resident at Suite 121? 09:01:19

15 A. Well, there is an office psychiatric, 09:01:25
16 which is a counselor that is there. There is Hope 09:01:29
17 Recovery, which is another counselor that's there, 09:01:36
18 and myself and some gentlemen that do some sort of 09:01:39
19 business consulting. 09:01:45

20 Q. And do you know those gentlemen's business 09:01:47
21 name or personal name? 09:01:49

22 A. Robert is the only thing I remember of his 09:01:51
23 name, yes. 09:01:53

24 Q. Do you have any understanding as to what 09:01:54
25 type of business consulting occurs? 09:01:56

1 GREGORY ANGLIN

2 not asking for any conversations between you and me. 09:04:13

3 THE WITNESS: Right. 09:04:17

4 A. I'm sorry, could you ask the question one 09:04:23
5 more time? 09:04:25

6 Q. I would like to understand what efforts 09:04:25
7 you undertook to identify whether or not you 09:04:27
8 possessed documents responsive to the five requests 09:04:30
9 detailed in Exhibit 1. 09:04:33

10 A. Well, I carefully read them, and it was my 09:04:34
11 understanding I did not have any copies of anything 09:04:40
12 that had been requested. 09:04:42

13 Q. Do you maintain files related to your 09:04:46
14 businesses at the Suite 121 address we spoke about 09:04:49
15 earlier? 09:04:54

16 A. No, I do not. 09:04:54

17 Q. Where do you maintain documents related to 09:04:55
18 your businesses? 09:04:58

19 A. At my personal residence. 09:04:58

20 Q. Do you use email for your business? 09:05:03

21 A. Well, I'm retired, so I don't really do 09:05:06
22 much business. 09:05:10

23 Q. Have you ever used email related to your 09:05:12
24 businesses in the last five years? 09:05:15

25 A. I mean, I'm sure I've sent some emails. I 09:05:23

1 GREGORY ANGLIN

2 don't really use email much. It's not really my 09:05:26
3 thing. 09:05:30

4 Q. Understood. Do you have an email address? 09:05:30

5 A. Yes, I do. 09:05:32

6 Q. What is that? 09:05:33

7 A. It's G R E G O R Y M A R K A N G L I 09:05:33
8 N@yahoo. 09:05:39

9 Q. And did you review the emails sent or 09:05:42
10 received from that address in connection with the 09:05:46
11 subpoena? 09:05:49

12 A. I'm not sure I understand what you're 09:05:52
13 asking. I'm sorry. 09:05:54

14 Q. As part of the efforts to respond to the 09:05:55
15 subpoena, did you log into your email account and 09:05:57
16 determine whether or not there's any emails, 09:06:00
17 correspondence, documents, responsive to the subpoena 09:06:02
18 in your email inbox? 09:06:05

19 A. Oh, yes, I did check my email. 09:06:07

20 Q. When did you do that? 09:06:09

21 A. After I received the subpoena. 09:06:10

22 Q. And that analysis revealed that there were 09:06:14
23 no documents responsive? 09:06:17

24 A. None at all, no. 09:06:18

25 Q. Did you talk to any person you worked with 09:06:23

1 GREGORY ANGLIN

2 in your business to look for responsive documents? 09:06:27

3 A. When you say my business, I'm not sure 09:06:34

4 what you're asking. 09:06:36

5 Q. I believe you said earlier that you work 09:06:38

6 in the counseling business? 09:06:40

7 A. I'm sorry, I retired about five years ago, 09:06:42

8 so I don't do any counseling. 09:06:46

9 Q. Do you still maintain an office address? 09:06:48

10 A. I get my mail sent to the office, my 09:06:51

11 personal mail. 09:06:53

12 Q. Do you have office space at Suite 121? 09:06:54

13 A. No, I do not. 09:06:57

14 Q. Do you ever visit that location? 09:06:58

15 A. To pick up my mail, yes. 09:07:00

16 Q. For any other reason? 09:07:01

17 A. No, I don't think so. 09:07:08

18 Q. Do you pay monthly rental? 09:07:10

19 A. Yes, I do. 09:07:13

20 Q. And what do you understand that payment to 09:07:15

21 represent? Why are you paying rent? 09:07:18

22 A. Well, because I'm still on a lease for 09:07:21

23 another 18 months. 09:07:23

24 Q. Do you have any possessions at that 09:07:27

25 location? 09:07:29

1 GREGORY ANGLIN

2 Q. Do you know of any bank accounts Moonbase 09:13:04
3 Holdings uses? 09:13:07

4 A. No, I do not. 09:13:08

5 Q. Do you know if Moonbase -- I'll just call 09:13:12
6 it Moonbase, but you'll know that I'm referring to 09:13:15
7 the entity Moonbase Holdings, LLC, is that fair? 09:13:19

8 A. Yes, sir. 09:13:23

9 Q. Do you know if Moonbase has any financial 09:13:23
10 obligations? Has it taken out any loans? Has it 09:13:25
11 bought any property? 09:13:28

12 A. I don't know. 09:13:29

13 Q. Do you know if Moonbase is still in 09:13:32
14 existence today? 09:13:36

15 A. I do not know. 09:13:38

16 Q. Have you ever spoken to your son about 09:13:39
17 Moonbase after that initial conversation where he 09:13:41
18 told you he was going to set it up? 09:13:44

19 A. I don't recall ever talking to him about 09:13:53
20 it, no. 09:13:54

21 Q. You talked to him initially when he told 09:13:58
22 you he was going to create it, correct? 09:14:00

23 A. He told me he was going to create it, yes. 09:14:04

24 Q. And it's your testimony that after that 09:14:07
25 date and time, you never spoke to him about it again? 09:14:09

1 GREGORY ANGLIN

2 A. Okay. Thank you. When I asked him to -- 09:15:45
3 he wanted to set up a post office box, and he -- I'm 09:15:59
4 trying to remember the details of it. He wanted to 09:16:10
5 establish a post office box, and he set it up under 09:16:15
6 Andrew Anglin. And I think there was some connection 09:16:22
7 between those, but I'm really not sure. 09:16:26

8 Q. And what involvement, if any, did you have 09:16:28
9 in the setting up of a post office box? 09:16:30

10 A. I filled out the application for the 09:16:34
11 postal service for his post office box. 09:16:35

12 Q. Why did you do that? 09:16:39

13 A. Because being out of the country at the 09:16:40
14 time, he was unable to set up a post office box, and 09:16:43
15 I told him I would do it for him. 09:16:48

16 Q. And did you have any understanding 09:16:50
17 regarding the purpose of setting up a post office 09:16:52
18 box? 09:16:54

19 A. For him to send his personal mail. 09:16:58

20 Q. Other than that understanding, did you 09:17:08
21 have any other awareness as to why he needed a post 09:17:09
22 office box? 09:17:13

23 A. I don't believe I did. 09:17:19

24 Q. Okay. Had you assisted him, prior to the 09:17:20
25 creation of the post office box, had you ever 09:17:23

1 GREGORY ANGLIN

2 assisted him with securing mail? 09:17:26

3 A. Yes, I had, at -- well, when he began 09:17:29

4 traveling in his 20's, he started using my office 09:17:35

5 address as his mailing address. 09:17:41

6 Q. And is this the address we discussed 09:17:43

7 earlier, Suite 121, 6827? 09:17:46

8 A. That's correct. 09:17:49

9 Q. And did you give him permission to do 09:17:50

10 that? 09:17:52

11 A. I gave him permission to have his personal 09:17:54

12 mail directed to my post office box -- to my office, 09:17:57

13 yes. 09:18:01

14 Q. And how would he retrieve it from the 09:18:02

15 office? 09:18:04

16 A. Well, there wasn't a lot of mail, but when 09:18:08

17 he came in town, I guess he would get it. But there 09:18:11

18 really wasn't much. 09:18:15

19 Q. When you would pick up your mail at Suite 09:18:17

20 121, did you also pick up his mail? 09:18:20

21 A. Yes. 09:18:24

22 Q. Okay. And what did you do with it? 09:18:24

23 A. With his personal mail? 09:18:26

24 Q. Yes, sir. 09:18:27

25 A. I'm trying to remember. We're talking 09:18:48

1 GREGORY ANGLIN

2 about his personal mail -- what mail are we talking 09:18:51

3 about exactly? His personal mail? 09:18:54

4 Q. Other than personal mail directed to 09:18:57

5 Mr. Andrew Anglin what other type of mail was sent to 09:18:59

6 that address? 09:19:03

7 A. Are we talking about the office address or 09:19:07

8 the post office box address, I'm sorry? 09:19:09

9 Q. Right now, sir, we're talking about Suite 09:19:11

10 121, 6827 North High Street. 09:19:13

11 A. Okay. He received legal documents to that 09:19:17

12 address. He received contributions sent to him. I 09:19:20

13 don't know if they were contributions; probably the 09:19:30

14 wrong word. Readers of the Daily Stormer would send 09:19:32

15 money to that address. 09:19:35

16 Q. And I believe you testified earlier that 09:19:38

17 you would pick up this mail. And my follow-up 09:19:40

18 question was: What would you do with it after you 09:19:45

19 picked it up? 09:19:47

20 A. If there were -- I would deposit it into 09:19:49

21 his bank account. 09:19:52

22 Q. Okay. And what bank is that? 09:19:56

23 A. [REDACTED] 09:19:57

24 Q. And what is the name of the account 09:20:01

25 holder? 09:20:02

1 GREGORY ANGLIN

2 A. Andrew Anglin. 09:20:04

3 Q. And do you have the account number? 09:20:06

4 A. I have it somewhere. I don't know it. 09:20:10

5 I'm sure I could retrieve it. 09:20:14

6 MR. QURESHI: We would make a request for 09:20:16

7 that information, please. 09:20:17

8 And what was the frequency with which you 09:20:21

9 would make deposits on behalf of Mr. Andrew Anglin? 09:20:23

10 A. It varied quite a lot. Perhaps once a 09:20:33

11 month. 09:20:39

12 Q. The address at the [REDACTED] where you 09:20:43

13 would make the deposits, do you recall that? 09:20:45

14 A. I don't. It was normally -- well, there 09:20:48

15 were a couple [REDACTED] branches that are near my home. 09:20:50

16 So one of them would have been at Graceland Shopping 09:20:53

17 Center. One of them would have been on 09:20:56

18 Dublin-Granville Road. 09:21:00

19 Q. The deposits you would make are in an 09:21:05

20 account held in Mr. Andrew Anglin's name, is that 09:21:08

21 correct? 09:21:11

22 A. That's correct. 09:21:12

23 Q. Was there any business account associated 09:21:12

24 with the funds that you would receive? 09:21:14

25 A. No. 09:21:17

1 GREGORY ANGLIN

2 Q. And I understand that you said it would -- 09:21:20
3 the amounts would vary, the frequency would vary, 09:21:23
4 approximately once a month, is that correct? 09:21:26

5 A. Yes. Maybe not quite that often. 09:21:29

6 Q. And going back in time how far? 09:21:32

7 A. Probably five years. 09:21:39

8 Q. Roughly 2013, five years from today? 09:21:42

9 A. Roughly, yes. 09:21:49

10 Q. And what was the order of magnitude of the 09:21:50
11 deposits you would make on behalf of 09:21:53
12 Mr. Andrew Anglin? 09:21:55

13 A. I'm not sure I know what that means. 09:21:56

14 Q. I'm just looking for the amounts, sir. 09:21:58
15 You said you would make deposits once a month, 09:22:00
16 roughly. I'm trying to understand how big the 09:22:02
17 deposits were. 09:22:06

18 A. Up until 2000 -- we're going way out of 09:22:10
19 the -- maybe \$1,500 a month on average up until mid 09:22:16
20 2017, and then there was a spike in the deposits. 09:22:36

21 Q. A spike increase? 09:22:41

22 A. Increase. 09:22:42

23 Q. To what magnitude? 09:22:43

24 A. You know, I'm just not comfortable 09:22:47
25 guessing on that. I mean, significantly more than a 09:22:49

1 GREGORY ANGLIN

2 thousand dollars or \$1,500 a month.

09:22:52

3 Q. Was it more than 10,000?

09:22:55

4 A. Yes.

09:22:56

5 Q. More than 25,000?

09:22:57

6 A. You mean average a month? I'm sorry. Oh,

09:23:00

7 no, not average a month.

09:23:02

8 Q. What about an aggregate?

09:23:04

9 A. Again, I'm not sure what you're asking.

09:23:07

10 Q. I'm just trying to get a sense of the

09:23:09

11 total amount of funds that were deposited into the

09:23:11

12 account at [REDACTED]

09:23:15

13 A. Over what period?

09:23:16

14 Q. Since it started, from 2013 through the

09:23:18

15 present. I believe you said for some time it was

09:23:20

16 about 1500 to a thousand dollars a month, but there

09:23:22

17 was a spike. So I think I'm focused now on the

09:23:25

18 spike. How much did it spike to?

09:23:28

19 A. If I had to guess an amount totally

09:23:35

20 deposited, it's a guess. We're allowed to do that,

09:23:38

21 is that right?

09:23:42

22 Q. I'm entitled to your best testimony. If

09:23:43

23 you're telling me your best testimony is a guess, I

09:23:46

24 would like to know what that guess is.

09:23:48

25 A. My guess would be the total deposits were

09:23:50

1 GREGORY ANGLIN

2 between -- let me just think for a moment. My guess 09:23:53

3 would be between, over the five-year period, between 09:24:03

4 100,000 and 125,000 would be my guess total deposits. 09:24:07

5 Q. Bank statements for this particular 09:24:14

6 account, were they also sent to the Suite 121 09:24:16

7 address? 09:24:18

8 A. No, they were not. 09:24:20

9 Q. Do you know where they were sent? 09:24:21

10 A. No, I do not. 09:24:23

11 Q. Did you have any signatory authority over 09:24:24

12 that account? 09:24:26

13 A. No, I did not. 09:24:26

14 Q. Other than depositing funds into the 09:24:28

15 account, did you do anything else with respect to the 09:24:31

16 account, sir? 09:24:33

17 A. No, I did not. 09:24:33

18 Q. Did you ever make any withdrawals? 09:24:36

19 A. No, I did not. 09:24:38

20 Q. Are you still engaging in this activity? 09:24:41

21 A. No, I'm not. 09:24:43

22 Q. When did it cease? 09:24:45

23 A. I think my last deposit was sometime last 09:24:51

24 year. 09:24:54

25 Q. Are you able to approximate when last 09:24:55

1 GREGORY ANGLIN

2 year? When you say last year, it's 2017? 09:24:57

3 A. That's correct. 09:25:00

4 Q. Are you able to approximate when in 2017? 09:25:01

5 A. My best guess would be my last deposit was 09:25:05

6 December of 2017. 09:25:07

7 Q. And I would like to focus in a little bit 09:25:11

8 of the particulars of the deposits. 09:25:13

9 [REDACTED] I'm sorry, just let me 09:25:16

10 interrupt. You're talking still now about deposits 09:25:17

11 made into Andrew Anglin's personal account? This has 09:25:20

12 nothing to do with Moonbase. 09:25:24

13 MR. QURESHI: Well, I'm trying to 09:25:25

14 understand the relationship between Mr. Anglin and 09:25:26

15 Mr. Moonbase (sic). I believe he said Mr. Anglin set 09:25:29

16 up Moonbase. 09:25:32

17 [REDACTED] Right. But I think to the 09:25:33

18 extent you're going further than the scope of the 09:25:33

19 court's order, I would just ask you to use caution 09:25:37

20 there. 09:25:40

21 MR. QURESHI: I appreciate that. Thank 09:25:41

22 you. 09:25:42

23 Q. I would like to understand a little bit 09:25:43

24 about the nature of the funds that you deposited on 09:25:44

25 behalf of Mr. Andrew Anglin. Was it cash or was it 09:25:48

1 GREGORY ANGLIN

2 checks that were received at Suite 121? 09:25:52

3 A. There was both. 09:25:57

4 Q. Would you say it was evenly split or was 09:25:59

5 there more checks or more cash? 09:26:01

6 A. I didn't really pay attention to that. I 09:26:11

7 couldn't really say. 09:26:13

8 Q. Did you notice any frequency in the people 09:26:15

9 who were sending checks? Were there certain names 09:26:19

10 that seemed more regular than others? 09:26:21

11 A. I don't know that I really paid attention 09:26:28

12 to who was writing the checks. I'm sure that there 09:26:29

13 were people that sent them regularly and people that 09:26:34

14 did not, but I didn't really pay attention to that. 09:26:36

15 Q. So you're unable to identify any name that 09:26:39

16 might have appeared on any check that you deposited 09:26:41

17 over a five-year period? 09:26:44

18 A. I deposited checks into his account 09:27:05

19 written from me. 09:27:08

20 Q. Other than yourself, anybody else whose 09:27:11

21 name you might recall that appeared on a check? 09:27:14

22 A. I don't recall any other names. 09:27:17

23 Q. Do you know if the checks were coming from 09:27:22

24 United States or were they coming from overseas? 09:27:24

25 A. Both. 09:27:29

1 GREGORY ANGLIN

2 Q. Did you ever deposit any foreign currency? 09:27:31

3 A. I deposited foreign currency in to my 09:27:40

4 personal account and then wrote a check for whatever 09:27:44

5 amount that was into my son's personal account. 09:27:48

6 Q. Okay. Do you recall what foreign currency 09:27:53

7 you deposited into your own account and subsequently 09:27:56

8 wrote a check to your son's account? 09:27:59

9 A. The primary foreign courtesy would have 09:28:02

10 been pounds, but there were multiple foreign 09:28:03

11 currencies. 09:28:07

12 Q. This is, again, over the five-year period, 09:28:08

13 2013 to roughly December of 2017? 09:28:10

14 A. That's correct. 09:28:13

15 Q. Were there occasions when you wrote checks 09:28:18

16 to Mr. Andrew Anglin's account other than those 09:28:20

17 instances in which foreign currency was received? 09:28:25

18 A. There were sometimes that I did it with 09:28:31

19 United States currency as well. 09:28:33

20 Q. You would deposit the money received at 09:28:36

21 Suite 121 into your personal account, and then write 09:28:38

22 a check to Mr. Andrew Anglin for deposit in his 09:28:41

23 account? 09:28:45

24 A. That's correct. 09:28:45

25 Q. Okay. Why did you do that? 09:28:45

1 GREGORY ANGLIN

2 A. Because [REDACTED] changed their bank policy to 09:28:48
3 where you could not deposit cash into their account 09:28:53
4 unless you were the account holder. 09:28:56

5 Q. When did that change occur? 09:28:58

6 A. Maybe at the beginning of 2017. I don't 09:29:10
7 recall exactly. 09:29:12

8 Q. And the deposits that you made in to your 09:29:14
9 own account, are those also at [REDACTED] or is it some 09:29:16
10 other banking institution? 09:29:19

11 A. That was a different banking institution. 09:29:24

12 Q. What institution was it? 09:29:26

13 A. [REDACTED] 09:29:27

14 Q. Let's turn back to Moonbase, sir. Does 09:29:42
15 Moonbase maintain any financial records of which you 09:29:45
16 are aware? 09:29:47

17 A. Not of which I'm aware. 09:29:49

18 Q. Does it have any assets? 09:29:51

19 A. Not that I am aware of. 09:29:54

20 Q. You mentioned at some point that the name 09:29:57
21 Andrew Anglin was registered as a trade name; do you 09:30:00
22 recall that? 09:30:03

23 A. Yes, I do. 09:30:03

24 Q. What entity registered it? 09:30:06

25 A. I think Moonbase did, but I'm not certain 09:30:10

1 GREGORY ANGLIN

2 Q. Have you had any discussions with 09:31:21
3 Mr. Andrew Anglin about the Daily Stormer? 09:31:23

4 A. Yes. 09:31:28

5 Q. Okay. And what do you recall about those 09:31:29
6 discussions? 09:31:32

7 A. Can you clarify your question a little 09:31:38
8 bit? What kind of discussions are you asking about? 09:31:40

9 Q. I'm trying to understand if you've spoken 09:31:42
10 to your son about this website and his role in it, 09:31:44
11 his involvement in it. What has he told you about 09:31:47
12 it? That is what I'm trying to get at. 09:31:50

13 A. Well, he writes on the website about 09:31:56
14 issues and things that I guess are important to him. 09:32:00

15 Q. And who funds the website? Where does the 09:32:04
16 money for the website come? 09:32:09

17 A. I don't really know how he structures 09:32:12
18 that. 09:32:15

19 Q. Have you ever spoken to him about that? 09:32:15

20 A. I know that he gets bitcoin, but I don't 09:32:22
21 know anything about how that works. He has mentioned 09:32:26
22 bitcoin before, though. 09:32:30

23 Q. And when did he mention bitcoin? 09:32:31

24 A. I don't know. Whenever bitcoin became a 09:32:34
25 thing. 09:32:36

1 GREGORY ANGLIN

2 Q. But was it this year, 2018? 09:32:37

3 A. No, maybe a year ago. A year, year and a 09:32:41

4 half ago. 09:32:45

5 Q. When is the last time you spoke with him? 09:32:46

6 A. Just a few days ago. 09:32:49

7 Q. And what do you recall about that 09:32:51

8 conversation? 09:32:54

9 A. Just catching up, dad stuff, told him I 09:32:56

10 was mad about having to come in today. 09:32:59

11 Q. Was it a phone call? Was it an in-person 09:33:01

12 meeting? 09:33:03

13 A. Phone call. 09:33:04

14 Q. And where was he calling from? 09:33:04

15 A. I don't know. 09:33:06

16 Q. Did you receive a call on your cell phone? 09:33:08

17 Did you receive a call on your home phone? Where 09:33:10

18 were you when you received the call? 09:33:13

19 A. It was my cell phone. 09:33:15

20 Q. Does your cell phone tell you the incoming 09:33:16

21 number? 09:33:19

22 A. Yes. 09:33:19

23 Q. And what was the incoming number? 09:33:19

24 A. I don't recall. 09:33:21

25 Q. Was it an international number? 09:33:22

1 GREGORY ANGLIN

2 A. No -- I'm sorry, what is the question 09:42:59
3 again? 09:43:02

4 Q. Have you ever spoken to Miss Karen 09:43:02
5 Zappitelli about these Articles of Organization for a 09:43:05
6 Domestic Limited Liability Company that's reflected 09:43:07
7 in Exhibit 2? 09:43:10

8 A. I'm not sure what the Articles of 09:43:11
9 Organization are. Is that on this document? 09:43:13

10 Q. Yes, sir. If you turn to Page 2 of 09:43:17
11 Exhibit 2, you'll see that the title is Articles of 09:43:19
12 Organization for a Domestic Limited Liability 09:43:24
13 Company; do you see that, sir? 09:43:27

14 A. Yes. 09:43:29

15 Q. Have you ever spoken to Miss Zappitelli 09:43:29
16 about this document? 09:43:31

17 A. I don't recall. 09:43:32

18 Q. If you turn to Page 3, you'll notice the 09:43:32
19 signature at the bottom? 09:43:38

20 A. Yes. 09:43:38

21 Q. Do you remember recognize that signature? 09:43:39

22 A. No, I do not. 09:43:40

23 Q. Do you know if that is your son's 09:43:41
24 signature, sir? 09:43:42

25 A. I do not know. 09:43:43

1 GREGORY ANGLIN

2 Q. Okay. Did you ever sign this document on 09:43:44
3 behalf of your son? 09:43:46

4 A. No, I did not. 09:43:49

5 Q. Did he ever ask you to do that? 09:43:51

6 A. No, he did not. 09:43:54

7 Q. Do you see the address under the General 09:43:56
8 Appointment of Agent section on Page 2? 09:44:02

9 A. Yes. 09:44:05

10 Q. And what is that address? 09:44:05

11 A. 6827 North High Street, Suite 121. 09:44:07

12 Q. That, in fact, is your business address? 09:44:11

13 A. That's correct. 09:44:13

14 Q. And it was your business address in 09:44:13
15 September of 2016? 09:44:15

16 A. That is correct. 09:44:17

17 Q. Did you give permission for Mr. Andrew 09:44:17
18 Anglin to use this business address as the 09:44:20
19 Appointment of Agent Address for Moonbase Holdings, 09:44:23
20 LLC? 09:44:25

21 A. I don't believe I did. I can't say with 09:44:38
22 absolute certainty, but I don't believe I did. 09:44:40

23 Q. Did he ever tell you he was going to do 09:44:43
24 this? 09:44:45

25 A. He did tell me he was going to do it. 09:44:45

1 GREGORY ANGLIN

2 Q. Do you have any understanding of a filing 09:47:59
3 fee associated with the submission of Articles of 09:48:01
4 Organization for a Domestic Limited Liability 09:48:04
5 Company? 09:48:07

6 A. I'm sorry, could you say that again? 09:48:11

7 Q. Do you know whether you have to submit a 09:48:13
8 fee in order to register a company in Ohio? 09:48:14

9 A. Yes, you do. 09:48:16

10 Q. Do you know how Mr. Andrew Anglin 09:48:18
11 submitted the fee for Moonbase Holdings in September 09:48:20
12 of 2016? 09:48:22

13 A. It was probably paid by Karen Zappitelli. 09:48:31
14 I don't know for sure. 09:48:35

15 Q. That was going to be my follow-up 09:48:36
16 question. What makes you say that? 09:48:38

17 A. Because I paid to reimburse them for this. 09:48:41
18 And my recollection was that that was a part of the 09:48:48
19 reimbursement to them. 09:48:51

20 Q. Okay. What's your understanding of the 09:48:52
21 reimbursement that they sought from you? 09:48:54

22 A. What's my understanding of it? 09:48:59

23 Q. Yes, sir. 09:49:00

24 A. I don't know what that means. 09:49:01

25 Q. Did they call you one day and say, hey, 09:49:03

1 GREGORY ANGLIN

2 write us a check for \$99? How did the process play 09:49:05
3 out? 09:49:09

4 A. I think she sent a bill, and then I paid 09:49:21
5 it. 09:49:25

6 Q. Where did she send the bill to? 09:49:26

7 A. That would have been my office address. 09:49:29

8 Q. The 6827 North High Street, Suite 121? 09:49:32

9 A. That's correct. 09:49:37

10 Q. And do you have a copy of the invoice? 09:49:37

11 A. No, I do not. 09:49:41

12 Q. Who was the invoice directed to? 09:49:42

13 A. I don't recall. 09:49:45

14 Q. Was it directed to you? 09:49:46

15 A. I don't recall. 09:49:49

16 Q. Okay. Did you ask any questions before 09:49:50
17 paying the invoice? 09:49:53

18 A. I don't believe so. 09:50:00

19 Q. Can you help me understand the process 09:50:01
20 between receipt of invoice and payment of the 09:50:03
21 reimbursement to Miss Zappitelli? 09:50:07

22 A. Well, I knew that they were setting up an 09:50:10
23 LLC for my son, and they sent an invoice. I paid the 09:50:15
24 invoice, and then was reimbursed by my son. 09:50:21

25 Q. And why did you pay the invoice? 09:50:25

1 GREGORY ANGLIN

2 A. Because my son was out of the country. 09:50:28

3 Q. Did he ask you to pay it? 09:50:30

4 A. Yes, he did. 09:50:32

5 Q. And was it in a phone call or an email? 09:50:33

6 How did he communicate that information to you? 09:50:36

7 A. I don't recall. 09:50:42

8 Q. And what understanding did you have about 09:50:45

9 getting reimbursement from your son after you paid 09:50:48

10 this amount? 09:50:51

11 A. Well, I mean, I don't pay any expenses for 09:50:54

12 his adventures here. So he reimburses me for that. 09:50:57

13 Q. What is that understanding based on? Have 09:51:03

14 you talked to him about it or is that just an 09:51:05

15 implicit understanding? 09:51:08

16 A. It's an implicit understanding. 09:51:09

17 Q. How long after you paid the invoice to the 09:51:11

18 Zappitellis for the creation of Moonbase did you 09:51:14

19 receive reimbursement from your son? 09:51:17

20 A. I don't recall. 09:51:20

21 Q. Did he send you a check? 09:51:21

22 A. No. 09:51:23

23 Q. How did you get reimbursed? 09:51:24

24 A. I used cash from money that had been sent 09:51:25

25 to him. 09:51:29

1 GREGORY ANGLIN

2 Q. Okay. Do you keep any accounting or 09:51:30
3 ledger of the amounts that are sent to him? 09:51:35

4 A. No, I don't. 09:51:39

5 Q. So you just deducted \$99 from a 09:51:41
6 contribution, and the remainder you deposited in the 09:51:44
7 account; is that how it worked? 09:51:48

8 A. Yes. 09:51:58

9 Q. Did this occur in September of 2016? 09:52:00

10 A. It looks like it did from the date. I 09:52:03
11 don't have any recollection of that. 09:52:05

12 Q. The amount that you paid for the creation 09:52:07
13 of Moonbase Holdings, the \$99, did you write a check 09:52:10
14 to the Zappitellis? 09:52:14

15 A. My recollection -- and I'm not sure this 09:52:24
16 is exactly right -- but my recollection was that 09:52:26
17 their fee was about \$500 total. So I would have 09:52:30
18 written a check to Zappitellis and then being 09:52:35
19 reimbursed by my son. 09:52:37

20 Q. The total amount was \$500? 09:52:40

21 A. That is my recollection. 09:52:42

22 Q. The check that you wrote to the 09:52:43
23 Zappitellis, was that from your account at [REDACTED] 09:52:44

24 [REDACTED]? 09:52:48

25 A. Probably, yes. 09:52:52

1 GREGORY ANGLIN

2 Q. Do you have access to that account? 09:52:54

3 A. No, I do not. 09:52:55

4 Q. Why not? 09:52:57

5 A. It's been closed down. 09:52:58

6 Q. When was it closed down? 09:53:00

7 A. Sometime late last year. 09:53:06

8 Q. And why was it closed late last year? 09:53:07

9 A. I don't know. The bank just closed it. 09:53:11

10 Q. And where do you bank currently? 09:53:15

11 A. [REDACTED] 09:53:17

12 Q. [REDACTED] -- 09:53:22

13 A. Frank Cathy -- or Frank Cat. Don't want 09:53:24

14 to mess you up there. 09:53:32

15 Q. You don't have a copy of a canceled check 09:53:36

16 from [REDACTED]? 09:53:38

17 A. Do I have a copy of a canceled check, no, 09:53:44

18 I do not. 09:53:46

19 Q. Did you get bank statements from 09:53:47

20 [REDACTED]? 09:53:49

21 A. I think the only statements I got were 09:53:54

22 online. That's the best of my recollection. 09:53:56

23 Q. Other than the \$500 you paid to the 09:54:06

24 Zappitellis for the creation of Moonbase, have you 09:54:09

25 paid for any other expenses associated with Moonbase 09:54:11

1 GREGORY ANGLIN

2 Holdings, LLC? 09:54:14

3 [REDACTED] Objection, just in terms of it 09:54:16
4 was clearly a reimbursement situation. He didn't 09:54:19
5 actually pay for his son. 09:54:22

6 MR. QURESHI: Okay. 09:54:25

7 [REDACTED] Just want to make it clear. 09:54:26

8 MR. QURESHI: Yeah, I think the record is 09:54:27
9 clear on that, that he subsequently was reimbursed 09:54:28
10 from his son's contributions. 09:54:31

11 A. So the question is: Were there any other 09:54:33
12 Moonbase expenses that I paid and then was reimbursed 09:54:35
13 for? 09:54:39

14 Q. Yes, sir. 09:54:40

15 A. Is that the question? 09:54:40

16 Q. Yes, sir. 09:54:41

17 A. I believe there was an expense associated 09:54:46
18 with registering the trade name Andrew Anglin. 09:54:48

19 Q. Do you recall the amount of that expense? 09:54:53

20 A. No, I do not. 09:54:55

21 Q. Can you describe the mechanics of how that 09:54:57
22 worked? 09:55:00

23 A. There was some fee involved, and I paid 09:55:03
24 it. I don't recall whether I paid -- used his cash 09:55:10
25 to pay the fee, or whether I wrote a check and then 09:55:13

1 GREGORY ANGLIN

2 was reimbursed by Andrew. I don't recall which it 09:55:17
3 was. 09:55:19

4 Q. And if you had written a check, this was 09:55:20
5 during a time when [REDACTED] was your bank? 09:55:23

6 A. That is correct. 09:55:26

7 Q. And I'm sorry if I am repeating a 09:55:28
8 question. Do you recall the amount that you paid? 09:55:30

9 A. No, I do not. 09:55:36

10 Q. Have you spoken to either Karen or John 09:55:41
11 Zappitelli recently? 09:55:44

12 A. Not recently. Sometime maybe five or six 09:55:50
13 months ago. 09:55:55

14 Q. What did you talk to them about five to 09:55:56
15 six months ago? 09:55:58

16 A. A friend of mine had some old coins he 09:55:59
17 wanted to sell, and I asked John if he had any ideas 09:56:02
18 about how to do that. 09:56:04

19 Q. Do you recall speaking with them about the 09:56:07
20 creation of Moonbase Holdings, LLC at any point in 09:56:09
21 time? 09:56:12

22 A. Not after the initial conversation that I 09:56:13
23 had with Karen. 09:56:16

24 Q. Do you know whether your son, in fact, did 09:56:17
25 speak to either Karen or John Zappitelli about the 09:56:20

1 GREGORY ANGLIN

2 A. Okay. 09:58:23

3 Q. Sir, have you seen Exhibit 3 before? 09:58:24

4 A. I don't recall ever having seen this, no. 09:58:26

5 Q. Okay. I'll represent to you it's a letter 09:58:28

6 from the Internal Revenue Service to Moonbase 09:58:31

7 Holdings, LLC, and it's directed to an address that 09:58:33

8 we've talked about earlier today, 6827 North High 09:58:37

9 Street, Suite 121, correct? 09:58:40

10 A. Right. 09:58:43

11 Q. Do you recall ever receiving this document 09:58:44

12 at that address? 09:58:46

13 A. No, I do not recall. 09:58:49

14 Q. Have you had any discussions with 09:58:52

15 Mr. Andrew Anglin about the procurement of an 09:58:53

16 employer identification number for Moonbase Holdings, 09:58:56

17 LLC? 09:58:57

18 A. No, I have not. 09:58:59

19 Q. Do you know whether Moonbase Holdings 09:59:01

20 files tax returns? 09:59:03

21 A. I don't know. 09:59:05

22 Q. Did you provide him any advice or guidance 09:59:06

23 on obtaining an employer I.D. number? 09:59:08

24 A. No, I did not. 09:59:12

25 Q. You mentioned earlier in the day about 09:59:27

1 GREGORY ANGLIN

2 receiving legal documents at the 6827 North High 09:59:29

3 Street address, Suite 121; do you recall that? 09:59:32

4 A. Yes, I do. 09:59:36

5 Q. And these are legal documents directed to 09:59:37

6 Mr. Andrew Anglin, is that correct? 09:59:39

7 A. When you say legal documents, I'm talking 09:59:41

8 about documents that come from attorneys, that have 09:59:43

9 an attorney return address. 09:59:46

10 Q. Okay. What is your practice with those 09:59:48

11 documents, what do you do with them? 09:59:49

12 A. I put them in a big plastic tub. 09:59:51

13 Q. And what happens to them afterwards? 09:59:54

14 A. They sit in the tub. 09:59:56

15 Q. You don't forward them on to anybody? 09:59:58

16 A. No, I do not. 10:00:00

17 Q. And what about letters from the Internal 10:00:01

18 Revenue Service that were directed to that address, 10:00:03

19 what did you do with those? 10:00:06

20 A. Any mailings that are directed to Moonbase 10:00:07

21 or Daily Stormer I don't open. 10:00:13

22 Q. What do you do with it? 10:00:16

23 A. Throw them away. 10:00:18

24 Q. Did you put it in the tub or you throw it 10:00:18

25 away? 10:00:21

1 GREGORY ANGLIN

2 A. I put the attorney stuff in the tub. 10:00:21

3 Anything else I throw away. 10:00:23

4 Q. What is your practice to treat 10:00:25

5 correspondence from the Internal Revenue Service 10:00:27

6 directed to Moonbase? 10:00:29

7 A. That would be throw away. 10:00:30

8 Q. Do you ever have conversations with your 10:00:35

9 son about the fact that he has received 10:00:37

10 correspondence from the Internal Revenue Service that 10:00:40

11 you subsequently have thrown away; have you ever told 10:00:42

12 him that? 10:00:45

13 A. What I have told him is that I will not 10:00:46

14 open any correspondence addressed to Daily Stormer or 10:00:48

15 to Moonbase Holdings. 10:00:52

16 Q. And do you go on to tell him that you will 10:00:53

17 throw it away if it's from the Internal Revenue 10:00:55

18 Service? 10:00:58

19 A. I didn't specify the Internal Revenue 10:00:59

20 Service. What I said was: I will not open any mail 10:01:01

21 sent to Daily Stormer or Moonbase. 10:01:06

22 Q. And what did he say to you in response? 10:01:09

23 A. He said I can get anything I want online, 10:01:11

24 don't worry about it. 10:01:16

25 Q. Okay. And when contributions were 10:01:17

1 GREGORY ANGLIN

2 directed to the 6827 North High Street, Suite 121 10:01:19
3 address, were they directed to Mr. Andrew Anglin or 10:01:24
4 were they directed to the Daily Stormer or to 10:01:27
5 Moonbase? 10:01:31

6 A. They were directed to Andrew Anglin. 10:01:31
7 There was -- almost all were directed to 10:01:34
8 Andrew Anglin. 10:01:38

9 Q. The instances when they were not directed 10:01:40
10 to Andrew Anglin, who were they directed to? 10:01:42

11 A. I only recall one directed to the Daily 10:01:46
12 Stormer of the whole five years. 10:01:48

13 Q. And what did you do with that particular 10:01:50
14 correspondence? 10:01:53

15 A. Threw it away unopened. 10:01:54

16 Q. Okay. And how did you know it was a 10:01:55
17 financial contribution? 10:01:57

18 A. I don't know that it was for sure. It 10:01:58
19 wasn't from an attorney. It could have been a note 10:02:00
20 of encouragement. I don't know. No, I take that 10:02:03
21 back. There was another one that I remember that was 10:02:11
22 a ten dollar check that was made out to Daily 10:02:14
23 Stormer, and I remember throwing that away. 10:02:17

24 Q. And who was the envelope addressed to? 10:02:20

25 A. The envelope was addressed to Daily 10:02:26

1 GREGORY ANGLIN

2 Stormer. I opened it in error. I saw a ten dollar 10:02:29
3 check, and I threw it away. 10:02:34

4 Q. Are you aware of any bank accounts held by 10:02:36
5 Daily Stormer? 10:02:39

6 A. No, I'm not. 10:02:40

7 Q. Are you aware of any bank accounts held by 10:02:42
8 Moonbase Holdings, LLC? 10:02:45

9 A. No, I'm not. 10:02:47

10 Q. When your son told you he was going to 10:02:48
11 create an entity called Moonbase, did you ask him 10:02:50
12 why? 10:02:54

13 [REDACTED] Objection. We've talked about 10:02:54
14 this, I think, at some length. 10:02:55

15 MR. QURESHI: Yeah. I think it ties to 10:02:57
16 the specific line of questioning. I'm not going to 10:02:59
17 dwell on it. 10:03:02

18 A. No, I did not. 10:03:03

19 Q. What familiarity do you have with the 10:03:14
20 concept of trade names? What's a trade name? 10:03:16

21 A. I think it's a name you register so that 10:03:22
22 other people can't use it. I think that is what it 10:03:24
23 is. 10:03:26

24 Q. And how did you come about this 10:03:27
25 understanding? 10:03:28

1 GREGORY ANGLIN

2 (Plaintiff's Exhibit 4 was marked for 10:09:33
3 identification.) 10:09:33

4 Q. Mr. Anglin, I'm handing you a document 10:09:35
5 that's marked Exhibit 4. 10:09:37

6 A. Okay. 10:09:40

7 Q. Please take a moment to review it. 10:09:41

8 A. Okay. 10:10:00

9 Q. Have you seen this document before, 10:10:00
10 Mr. Anglin? 10:10:02

11 A. Yes, I have. 10:10:02

12 Q. What is it? 10:10:03

13 A. It is the trade name registration for the 10:10:04
14 name Andrew Anglin. 10:10:09

15 Q. And what role, if any, did you play in 10:10:11
16 this trade name registration for the name Andrew 10:10:13
17 Anglin? 10:10:15

18 A. I applied for the name. 10:10:16

19 Q. On whose behalf? 10:10:19

20 A. Andrew asked me to do it for him. 10:10:22

21 Q. If you turn to the second page of the 10:10:24
22 document, sir. 10:10:26

23 A. Yes. 10:10:27

24 Q. You'll see under name of the registrant 10:10:28
25 Moonbase Holdings, LLC? 10:10:31

1 GREGORY ANGLIN

2 A. Um-hum. 10:10:34

3 Q. Did I read that correctly? 10:10:34

4 A. Yes. 10:10:36

5 Q. Is it your understanding you were applying 10:10:36

6 for the trade name on behalf of Moonbase Holdings? 10:10:38

7 A. That's correct. 10:10:41

8 Q. And you knew that? 10:10:41

9 A. Yes. 10:10:42

10 Q. What other conversations do you recall 10:10:54

11 with Mr. Andrew Anglin about the registration of his 10:10:55

12 name as a trade name? 10:10:59

13 A. I don't recall anything else. 10:11:17

14 Q. Okay. Can you describe to me in as much 10:11:20

15 detail as you recall the request he made of you? 10:11:23

16 A. Well, again, I'm a little bit fuzzy on 10:11:28

17 this one. I think -- I just don't want to guess. I 10:11:32

18 don't know. 10:11:38

19 Q. Do you recall a telephone call in which 10:11:39

20 you had a conversation with him? 10:11:42

21 A. I don't recall the phone conversation. I 10:11:52

22 know that he asked me to register his name as a trade 10:11:53

23 name, but I don't recall the conversation. 10:11:57

24 Q. Okay. My question was a little more 10:11:58

25 basic. It is: Was it a phone conversation? Was it 10:12:01

1 GREGORY ANGLIN

2 a email? Was it a in-person meeting? Do you know 10:12:05
3 how the discussion arose? 10:12:08

4 A. Well, I know it wasn't in person, because 10:12:10
5 he was out of the country. I don't remember whether 10:12:12
6 it was email or phone. 10:12:16

7 Q. Okay. And in the survey of email that you 10:12:19
8 undertook to look for responsive documents did you 10:12:22
9 identify any email related to this topic? 10:12:26

10 A. No, I did not. 10:12:29

11 Q. Is it your practice to delete emails? 10:12:32

12 A. Yes, it is. 10:12:34

13 Q. Both in your inbox and your sent box? 10:12:35

14 A. That's correct. 10:12:38

15 Q. Did you work with the Zappitellis in 10:12:43
16 connection with this trade name registration in 10:12:45
17 Exhibit 4? 10:12:50

18 A. I don't think so. 10:12:57

19 Q. Had you ever done a trade name 10:12:58
20 registration before? 10:13:00

21 A. I may have for Morningstar Counseling, I 10:13:20
22 don't recall. 10:13:23

23 Q. And when you may have performed a trade 10:13:23
24 name registration for Morningstar, did you do it on 10:13:26
25 your own or did you work with an accountant or the 10:13:29

1 GREGORY ANGLIN

2 Zappitellis or consultant? 10:13:33

3 A. I don't have any recollection of that. 10:13:37

4 Once again, we're going back 15 years, 20 years, 10:13:38

5 something like that. 10:13:41

6 Q. Exhibit 4, though, is dated January of 10:13:42

7 2017, is it not? 10:13:44

8 A. I understand that. I was talking about 10:13:45

9 Morningstar. 10:13:47

10 Q. And in connection with Exhibit 4, did you 10:13:48

11 undertake any research to figure out how to do a 10:13:51

12 trade name registration? 10:13:54

13 A. I don't remember -- I don't know how I 10:14:10

14 knew to go to the secretary of state. I don't recall 10:14:13

15 that. 10:14:15

16 Q. Okay. How much time did it take to 10:14:15

17 undertake the trade name registration, sir? 10:14:18

18 A. Again, I just don't recall enough of the 10:14:21

19 details of this. It doesn't look like it would take 10:14:23

20 a lot of time, but I don't recall. 10:14:26

21 Q. Who paid for the registration fee? 10:14:29

22 A. Andrew paid for it. 10:14:32

23 Q. And how did that work? 10:14:34

24 A. He would have -- if I paid cash, then it 10:14:36

25 would have been Andrew's cash. If I wrote a check, 10:14:39

1 GREGORY ANGLIN

2 then Andrew would have reimbursed me. 10:14:42

3 Q. What makes you say that he would have 10:14:45

4 reimbursed you? 10:14:47

5 A. Because he always did. 10:14:48

6 Q. If you look at the second page of 10:14:49

7 Exhibit 4. You'll notice in the right-hand corner it 10:14:51

8 says Date Electronically Filed, January 5, 2017, is 10:14:53

9 that correct? 10:14:59

10 A. Yes. 10:15:00

11 Q. Does that refresh your recollection that 10:15:01

12 this document was electronically filed? 10:15:02

13 A. I just don't remember it. I don't 10:15:08

14 remember how it happened. 10:15:15

15 Q. And if it was electronically filed, sir, 10:15:17

16 do you have a recollection as to whether you 10:15:19

17 submitted credit card information, you provided 10:15:22

18 checking account information in order to pay the \$39 10:15:26

19 filing fee? 10:15:29

20 A. I just don't remember. I don't remember 10:15:30

21 much about this at all. I don't remember how it was 10:15:32

22 paid. I just don't remember the document very well. 10:15:36

23 Q. Okay. If you look at the first box in the 10:15:42

24 left-hand corner on Page 2 of Exhibit 4; do you see 10:15:49

25 that box, sir? 10:15:59

1 GREGORY ANGLIN

2 that's when he began everything. But, yeah I don't 10:43:58
3 remember. I just don't remember. 10:44:01

4 Q. Subsequent to the trade name registration, 10:44:03
5 after it was completed did you ever talk to him about 10:44:05
6 the trade name registration? 10:44:09

7 A. No, I didn't. 10:44:13

8 Q. Have you ever spoken to anyone else other 10:44:15
9 than your lawyer about the trade name registration of 10:44:16
10 Andrew Anglin on behalf of Moonbase Holdings, LLC? 10:44:20

11 A. No, I have not. 10:44:26

12 (Plaintiff's Exhibit 5 was marked for 10:44:30
13 identification.) 10:44:30

14 Q. Mr. Anglin, I'm handing you a document 10:44:31
15 that has been marked as Exhibit 5. Please take a 10:44:33
16 moment to review that, sir. 10:44:36

17 A. Okay. 10:44:46

18 Q. Have you seen this document before? 10:44:48

19 A. No, I have not. 10:44:49

20 Q. I'll represent to you, it is a printout 10:44:52
21 from the Whois Tool for a website entitled 10:44:54
22 DailyStormer.com. And if you look at the creation 10:44:57
23 date for the website, it's listed as March 20th, 10:45:02
24 2013; do you see that? 10:45:07

25 A. Yes, I do. 10:45:08

1 GREGORY ANGLIN

2 Q. And if you continue to read down that 10:45:10
3 column, you'll see there's an entry for registrant 10:45:13
4 name? 10:45:16

5 A. Yes. 10:45:16

6 Q. And is that your name listed, sir? 10:45:17

7 A. That is my name listed, yes. 10:45:19

8 Q. Did you have any involvement in the 10:45:22
9 registration of the website Daily Stormer.com on or 10:45:23
10 about March 20, 2013? 10:45:27

11 A. Yes, I did. 10:45:31

12 Q. What was that involvement? 10:45:32

13 A. This one I actually remember. I was 10:45:34
14 sitting in my living room of my condo with my son, 10:45:36
15 and he told me that he was going to start another 10:45:40
16 website. And I said, okay. And he asked if he could 10:45:45
17 use my credit card to register the name. And I asked 10:45:51
18 how much it was, and it wasn't very much money, so I 10:45:58
19 said fine. 10:46:02

20 Q. Was it your understanding at the time that 10:46:02
21 he didn't have his own credit card? 10:46:04

22 A. That's correct. 10:46:06

23 Q. And what bank issued the credit card that 10:46:06
24 was used to register this website? 10:46:09

25 A. Probably [REDACTED] although, it 10:46:11

1 GREGORY ANGLIN

2 could have been American Express. I don't know. 10:46:16

3 Q. What else do you recall about that 10:46:20

4 conversation? 10:46:22

5 A. Just that I had no idea I was going to be 10:46:26

6 the registrant of a website that he was going to run. 10:46:28

7 Q. Do you recall whether he entered the 10:46:33

8 information related to the creation of the website or 10:46:38

9 is that something you did? 10:46:41

10 A. He would have entered everything, and then 10:46:42

11 asked me for my credit card. 10:46:44

12 Q. Do you have any understanding as to why he 10:46:46

13 listed you as the registrant? 10:46:48

14 A. I have no idea. 10:46:49

15 Q. Did you ever ask him about that? 10:46:51

16 A. Yeah. 10:46:52

17 Q. And what was that conversation like? 10:46:53

18 A. Well, the conversation was -- let me think 10:46:54

19 for just a minute. When I realized I was the 10:47:00

20 registrant, we had a very direct conversation where I 10:47:07

21 told him I was very disappointed in him that he 10:47:13

22 allowed that to happen, and that I wanted it removed 10:47:16

23 immediately. 10:47:19

24 Q. And, sir, when did that occur? 10:47:20

25 A. I didn't even find out about it until 10:47:22

1 GREGORY ANGLIN

2 sure that the record is clear here. The domain name 11:00:51
3 was registered in March of 2013, correct? 11:00:54

4 A. Yes, that's correct. 11:00:57

5 Q. On the internet? 11:00:58

6 A. That's correct. 11:01:00

7 Q. And it listed you -- the registration 11:01:01
8 listed you as the registrant, the administrator, and 11:01:04
9 the technical contact, correct? 11:01:09

10 A. That's correct. 11:01:10

11 Q. And that's all reflected on Exhibit 5? 11:01:11

12 A. That's correct. 11:01:14

13 Q. And at some point after the registration 11:01:15
14 of the domain name reflected on Exhibit 5, you 11:01:18
15 expressed disappointment to your son about that fact, 11:01:22
16 correct? 11:01:25

17 A. That's correct. 11:01:26

18 Q. And my question was: Exhibit 6 is a trade 11:01:27
19 name registration for Daily Stormer. Did you submit 11:01:30
20 the trade name registration, Exhibit 6, before or 11:01:35
21 after you had expressed disappointment to your son 11:01:38
22 about the internet domain registration? 11:01:42

23 A. I don't recall. 11:01:45

24 Q. When you submitted the trade name 11:01:53
25 registration for Daily Stormer what did you 11:01:54

1 GREGORY ANGLIN

2 understand you were doing? 11:01:57

3 A. Honestly, I didn't understand anything. 11:02:06

4 What he said was: Can you register this name? He 11:02:08

5 may have said so someone else doesn't use it, I don't 11:02:13

6 remember. 11:02:16

7 Q. Okay. 11:02:17

8 A. I just remember him asking me to do that. 11:02:18

9 Q. At this point in time in December of 2016, 11:02:21

10 had you ever visited the website DailylyStormer.com? 11:02:24

11 A. Yes, I had. 11:02:29

12 Q. Okay. Did you know the content on the 11:02:30

13 website? 11:02:31

14 A. Yes, sir, I did. 11:02:32

15 Q. Had you formed an opinion about whether 11:02:33

16 you agree or disagree with the content? 11:02:35

17 A. Yes, I had. 11:02:37

18 Q. And with that opinion in mind, you agreed 11:02:38

19 to do what your son asked? 11:02:40

20 A. I have a difficult time as a dad sometimes 11:02:51

21 knowing what to support and what not to support. I 11:02:54

22 don't take responsibility for somebody else's 11:02:58

23 actions. He asked me to record this form, and I did. 11:03:01

24 Q. Okay. The filing fee associated with the 11:03:08

25 trade name registration in Exhibit 6, who paid that? 11:03:15

1 GREGORY ANGLIN

2 A. Andrew Anglin paid it. 11:03:21

3 Q. How did Andrew Anglin pay it? 11:03:23

4 A. I don't recall. 11:03:26

5 Q. Do you recall going to the clerk's office, 11:03:26

6 sir? 11:03:29

7 A. I think I can remember going to a clerk's 11:03:29

8 office on Broad Street or something downtown, and I 11:03:31

9 think it was related to this, but I'm just not 11:03:35

10 positive. And I don't recall whether I paid cash or 11:03:38

11 credit card, I just don't remember. 11:03:40

12 Q. And the visit that you do recall where you 11:03:42

13 went to the clerk's office, the cash or credit card 11:03:44

14 you used, was it yours? 11:03:48

15 A. It would not have been my son's. I never 11:03:51

16 used one of his. Is that your question? 11:03:53

17 Q. Yes, sir. 11:03:56

18 A. No. It would have been mine, yes. 11:03:56

19 Q. To go back to my earlier question: In 11:03:59

20 connection with the trade name registration of Daily 11:04:02

21 Stormer, who paid the filing fee? 11:04:04

22 A. This is the trade name document here, 11:04:09

23 right? 11:04:12

24 Q. Correct. Exhibit 6 is the trade name 11:04:12

25 registration. 11:04:14

1 GREGORY ANGLIN

2 A. No, I do not. 11:18:14

3 Q. Have you ever asked him that question? 11:18:17

4 A. I've never talked to him about Moonbase. 11:18:18

5 Q. In registering the trade name Daily 11:18:21

6 Stormer on behalf of Moonbase, you didn't have a 11:18:29

7 conversation with him? 11:18:34

8 A. Well, I suppose he would have said 11:18:42

9 register it under Moonbase, but that's -- I don't 11:18:45

10 know about the conversation, but I followed whatever 11:18:51

11 his directions were. 11:18:53

12 Q. And registering the name of Andrew Anglin 11:18:55

13 on behalf of Moonbase, that was also a conversation 11:18:59

14 about Moonbase, correct? 11:19:02

15 A. It was a request to register something on 11:19:09

16 behalf of Moonbase. 11:19:11

17 Q. So you would agree that that was a 11:19:13

18 conversation about Moonbase, sir? 11:19:15

19 A. Well, I wouldn't say that we had a 11:19:16

20 conversation about Moonbase, no. I would say exactly 11:19:18

21 that, that he said, can you register this trade name 11:19:23

22 under Moonbase. So if you want to define it as a 11:19:27

23 conversation or not, I wouldn't, but you certainly 11:19:31

24 may, if you like. 11:19:33

25 Q. Okay. Other than those instances, do you 11:19:34

1 GREGORY ANGLIN

2 recall any other instance in which Mr. Andrew Anglin 11:19:38

3 asked you to do something on behalf of Moonbase? 11:19:42

4 A. No, I don't recall anything else. 11:19:45

5 Q. Have you ever understood Mr. Andrew Anglin 11:20:05

6 to describe the financial condition of Moonbase? 11:20:10

7 A. No. 11:20:16

8 Q. Has he ever told you that it's on the cusp 11:20:17

9 of insolvency? 11:20:19

10 A. No. 11:20:21

11 Q. Has he ever said anything else about its 11:20:23

12 financial condition? 11:20:26

13 A. No, he has not. 11:20:26

14 (Plaintiff's Exhibit 8 was marked for 11:20:38

15 identification.) 11:20:38

16 Q. Mr. Anglin, I'm handing you a document 11:20:42

17 that's marked as Exhibit 8. Please take a moment to 11:20:45

18 review it. 11:20:50

19 A. Okay. 11:20:55

20 Q. Have you seen this document before, sir? 11:20:56

21 A. Yes, I filled it out. 11:20:58

22 Q. Okay. And what is it? 11:20:59

23 A. It's an application for a post office box. 11:21:01

24 Q. And why did you fill out an application 11:21:04

25 for a post office box? 11:21:07

1 GREGORY ANGLIN

2 A. On the heels of my conversation that 11:21:11
3 Andrew needed to remove -- not use my office address 11:21:13
4 any more, he advised me that he could not set up a 11:21:18
5 post office box unless he was in the country, and he 11:21:22
6 was out of the country and asked if I would help him 11:21:25
7 accomplish that. 11:21:29

8 Q. Did you have an understanding as to where 11:21:30
9 he was? 11:21:32

10 A. No, I did not. 11:21:32

11 Q. You never asked him? 11:21:33

12 A. No. 11:21:34

13 Q. And the conversation you had with him, was 11:21:42
14 that over the phone? 11:21:45

15 A. I believe so, yes. 11:21:48

16 Q. And he told you, I'm out of the country, 11:21:49
17 correct? 11:21:52

18 A. That is correct. Well, he didn't tell me 11:21:52
19 I'm out of the country. I knew he was out of the 11:21:54
20 country. 11:21:57

21 Q. And how did you know that he was out of 11:21:57
22 the country? 11:22:00

23 A. Because he hadn't been back in the country 11:22:00
24 for five years probably. 11:22:02

25 Q. And how did you know that? 11:22:03

1 GREGORY ANGLIN

2 A. Because he would have come and seen me if 11:22:04
3 he was in the country. 11:22:06

4 Q. Okay. And did you know where he was? 11:22:07

5 A. No. I know that at some point he spent 11:22:09
6 time in Thailand over that five-year period, but, no, 11:22:14
7 I did not know where he was. 11:22:20

8 Q. And you didn't believe it was important to 11:22:21
9 ask him? 11:22:23

10 A. No, I did not. 11:22:24

11 Q. Why not? 11:22:29

12 [REDACTED] Objection. Go ahead. 11:22:33

13 A. He's a private person, and I'm a talkative 11:22:38
14 guy. And so he prefers and I prefer to not know 11:22:46
15 where he is. 11:22:51

16 Q. Sir, if you look at the document marked as 11:22:54
17 Exhibit 8, I believe you testified earlier that you 11:22:58
18 filled out this form? 11:23:01

19 A. Do you mind if I come back to a question 11:23:02
20 real quick? I want to make sure I said the right 11:23:04
21 thing. 11:23:06

22 Q. Okay. 11:23:06

23 A. He could have actually been in Russia. I 11:23:07
24 said Thailand, but I don't know. 11:23:10

25 Q. What makes you think that he may have been 11:23:12

1 GREGORY ANGLIN

2 in Russia? 11:23:14

3 A. I know he had told me he had been in 11:23:16

4 Russia at one time, and I know that he had been in 11:23:18

5 Thailand at one time. 11:23:20

6 Q. And on the one time that he told you he 11:23:22

7 was in Russia, why did he tell you his location then, 11:23:24

8 but not on other occasions? 11:23:27

9 A. That was several years ago, and I think it 11:23:34

10 was -- I don't know why. 11:23:36

11 Q. I believe you testified that he was a 11:23:42

12 private person? 11:23:43

13 A. He is. 11:23:44

14 Q. And you were a talkative person? 11:23:45

15 A. That is what I said. 11:23:47

16 Q. Notwithstanding that, he shared with you 11:23:48

17 his location? 11:23:50

18 A. A number of years ago he did, yes. 11:23:52

19 Q. But more recently he has not? 11:23:54

20 A. That's correct. 11:23:56

21 Q. And you haven't asked him? 11:23:56

22 A. That's correct. 11:23:58

23 Q. If we turn to Exhibit 8, sir, the document 11:24:00

24 that I believe you testified you completed. 11:24:03

25 A. Yes. 11:24:06

1 GREGORY ANGLIN

2 Q. Do you recall when you filled this out? 11:24:08

3 A. No, I do not. This looks like it's dated 11:24:09

4 there, though. 11:24:12

5 Q. And what is the date that you understand? 11:24:13

6 A. Well, let me find it here. 11:24:15

7 Q. There is a date stamp in the right-hand 11:24:18

8 corner. 11:24:20

9 A. Yes, that says December 15, 2017. 11:24:21

10 Q. Sir, in the right-hand corner the date 11:24:32

11 that I make out is January 12, 2017. 11:24:34

12 A. Oh, I'm sorry. 11:24:37

13 Q. Where it's a post office stamp. 11:24:40

14 [REDACTED] It's hard to read. 11:24:43

15 A. I can read January 12. I can't quite read 11:24:46

16 the year. But if you guys say 2017, I'll go with 11:24:48

17 that. 11:24:51

18 Q. The December date you're referencing, 11:24:51

19 where do you see that? 11:24:53

20 A. That was at the top of my form there. 11:24:55

21 Q. Oh, okay. That's the date on which it was 11:24:57

22 faxed? 11:25:00

23 A. Okay. Sorry. 11:25:01

24 Q. The date in the right-hand corner I see is 11:25:02

25 January 12, 2017. 11:25:04

1 GREGORY ANGLIN

2 A. Okay. 11:25:05

3 Q. Is that consistent with your recollection? 11:25:06

4 A. I don't recall when. It certainly -- I 11:25:08

5 have no reason to believe that is wrong. 11:25:11

6 Q. Okay. And I believe you testified that 11:25:13

7 Mr. Andrew Anglin was out of the country and therefor 11:25:15

8 he requested that you set up a post office box for 11:25:19

9 him? 11:25:21

10 A. That's correct. 11:25:22

11 Q. And did you provide identification to the 11:25:23

12 post office in connection with this process? 11:25:26

13 A. Yes, I did. 11:25:30

14 Q. Did you also pay a sum? 11:25:31

15 A. I did, yes. 11:25:32

16 Q. How much did you pay? 11:25:33

17 A. I don't recall. Maybe \$125, something 11:25:35

18 around that range. 11:25:38

19 Q. And where did that money come from? 11:25:39

20 A. Andrew paid that. 11:25:40

21 Q. And can you describe for us the process by 11:25:42

22 which that occurred? 11:25:44

23 A. Again, I don't recall whether it was paid 11:25:45

24 directly with his cash or whether I paid it and then 11:25:47

25 he reimbursed me. 11:25:50

1 GREGORY ANGLIN

2 Q. And if it was the first option, paid 11:25:51
3 directly with his cash, how would you have access to 11:25:53
4 his cash? 11:25:56

5 A. It would be cash that was mailed to Andrew 11:25:57
6 Anglin that I would still have possession of. 11:26:00

7 Q. And if it was the second option, whether 11:26:06
8 you paid it and then he later reimbursed you, how 11:26:08
9 would you have paid for it? 11:26:11

10 A. I could have written a check. I could 11:26:14
11 have used a credit card. 11:26:16

12 Q. And at this point in time, did you have a 11:26:19
13 checking account at [REDACTED] January of 2017? 11:26:21

14 A. No, I did not. 11:26:29

15 Q. Okay. Did you bank at [REDACTED] at that 11:26:30
16 point in time? 11:26:34

17 A. Yes, I did. 11:26:35

18 Q. Your checking account was with [REDACTED]? 11:26:35

19 A. My checking account was. I probably used 11:26:38
20 a credit card. I don't use checks very often. 11:26:40

21 Q. What credit card might you have used? 11:26:43

22 A. [REDACTED] or possibly American Express. 11:26:46

23 Q. Okay. You testified earlier that 11:26:51
24 [REDACTED] closed at some point in time? 11:26:55

25 A. My checking account, not my credit card. 11:26:58

1 GREGORY ANGLIN

2 Q. The bank, itself, stayed open? 11:27:01

3 A. I'm sorry? 11:27:03

4 Q. The [REDACTED] institution, itself, 11:27:05
5 is in existence? 11:27:08

6 A. Oh, [REDACTED] institution, they closed my 11:27:10
7 accounts. 11:27:12

8 Q. Why did they close your accounts? 11:27:13

9 A. They never said. 11:27:15

10 Q. Did they ever send you any correspondence? 11:27:16

11 A. They just sent me a correspondence that 11:27:19
12 said we're closing your accounts, no explanation. 11:27:21

13 Q. And did they -- did you have money in the 11:27:25
14 accounts at the time they closed? 11:27:28

15 A. Yes, they mailed me checks. 11:27:30

16 Q. Did you ever ask them for an explanation? 11:27:33

17 A. Yes, I did. 11:27:36

18 Q. Okay. And I fail to understand. What did 11:27:38
19 I ask that was funny? 11:27:42

20 A. Yeah, I asked them for an explanation. I 11:27:43
21 thought it was kind of strange, and they didn't offer 11:27:46
22 one. 11:27:50

23 Q. Did you ask them in person or in writing? 11:27:51

24 A. Over the phone. 11:27:54

25 Q. Okay. Do you have any understanding that 11:27:56

1 GREGORY ANGLIN

2 the closing of the accounts was related in any way to 11:27:58
3 your association with Moonbase? 11:28:01

4 A. I don't have any reason to believe that, 11:28:04
5 no. 11:28:05

6 Q. Any reason to believe that it was because 11:28:06
7 of your association with Daily Stormer? 11:28:08

8 A. No, I don't have any reason to believe 11:28:10
9 that either. 11:28:12

10 Q. Did you ever raise this issue with anyone 11:28:19
11 other than [REDACTED]? 11:28:21

12 A. No. 11:28:26

13 Q. Turning back to Exhibit 8, sir. Might you 11:28:28
14 describe what you understood to be the reason 11:28:33
15 Mr. Andrew Anglin wanted his own P.O. box? 11:28:38

16 A. Because I was no longer going to allow 11:28:43
17 mail to be sent to -- he had already ended sending 11:28:46
18 mail to my office. 11:28:52

19 Q. And did you understand that mail would 11:28:53
20 continue to be sent to the P.O. box instead of the 11:28:57
21 6827 North High Street address that we talked about 11:29:02
22 earlier? 11:29:05

23 A. I wasn't surprised when it was, but we 11:29:07
24 didn't really talk about where he was going to send 11:29:10
25 it. So I wasn't surprised, but we didn't talk about 11:29:14

1 GREGORY ANGLIN

2 it. 11:29:17

3 Q. And did you have an understanding as to 11:29:18

4 where people would know to send mail for Mr. Andrew 11:29:22

5 Anglin, like, where would they get that information? 11:29:26

6 A. Well, I think it was on his website, but I 11:29:29

7 don't know that for sure. 11:29:32

8 Q. What website are you referring to? 11:29:34

9 A. That would be DailyStormer.com. 11:29:36

10 Q. So it's your understanding that at some 11:29:38

11 point the address on the website changed from 6827 11:29:40

12 North High Street, Suite 121, to a P.O. box? 11:29:43

13 A. That is correct. 11:29:50

14 Q. And whose responsibility was it to 11:29:54

15 retrieve mail from the P.O. box? 11:29:58

16 A. I retrieved the mail from the P.O. box. 11:30:01

17 Q. And how regularly did you retrieve mail 11:30:04

18 from the P.O. box? 11:30:06

19 A. It was sporadic. Somewhere between once a 11:30:08

20 week and once a month. 11:30:14

21 Q. And what type of mail would you retrieve? 11:30:15

22 A. I received money from readers of the Daily 11:30:19

23 Stormer. I received correspondence from attorneys, 11:30:31

24 and I don't recall anything else. 11:30:38

25 Q. Okay. Let's take them in reverse order. 11:30:44

1 GREGORY ANGLIN

2 A. Okay. 11:30:47

3 Q. The correspondence you received from 11:30:47

4 attorneys based on your earlier testimony, I 11:30:49

5 understand that went into the tub? 11:30:52

6 A. That's correct, yes, sir. 11:30:54

7 Q. And I would like to understand what 11:30:55

8 happened to the money that was received at the P.O. 11:30:58

9 box? 11:31:01

10 A. What happened to the money that was 11:31:02

11 received at the P.O. box? 11:31:03

12 Q. Yes, sir. 11:31:04

13 A. It was -- let me think for a minute. The 11:31:06

14 money received at the P.O. box, I think that this is 11:31:15

15 the time period at which [REDACTED] would not -- [REDACTED] 11:31:23

16 would not accept cash deposits. So if there was 11:31:33

17 cash, I would deposit it into my account, and then 11:31:36

18 write a check to Andrew for the same amount. And 11:31:40

19 then checks, I would deposit into the account. 11:31:44

20 Q. Okay. I'll break that down to make sure I 11:31:47

21 understand it. The cash deposits that would come in 11:31:50

22 to the P.O. box, you would deposit them into your 11:31:53

23 account? 11:31:56

24 A. At some point I did. There may have still 11:31:59

25 been a time when I was taking them directly to [REDACTED] 11:32:01

1 GREGORY ANGLIN

2 and they were accepting cash. But [REDACTED] changed 11:32:04
3 their banking policy to no longer accept cash. So at 11:32:07
4 some point, I would deposit the money in to my 11:32:10
5 account, write a check for the exact same amount, and 11:32:12
6 deposit it into Andrew's account. 11:32:15

7 Q. Okay. And which account would you deposit 11:32:18
8 the cash into, at what bank? 11:32:21

9 A. That would have been [REDACTED] I 11:32:31
10 believe. 11:32:34

11 Q. And the checks that you would write to 11:32:35
12 Mr. Andrew Anglin were written from what bank? 11:32:37

13 A. From [REDACTED] 11:32:41

14 Q. And when [REDACTED] closed your 11:32:46
15 account how did your practice change, if at all? 11:32:48

16 A. I think by then -- I don't recall with 11:32:56
17 certainty, but I think by then he had stopped -- let 11:33:01
18 me think. It's so hard. Could you ask the question 11:33:05
19 again? I'm sorry. 11:33:15

20 Q. Certainly. When [REDACTED] closed 11:33:16
21 your accounts how did your practice of depositing 11:33:19
22 cash change? 11:33:22

23 A. I don't believe I deposited -- I didn't 11:33:29
24 deposit any cash beyond that date. 11:33:37

25 Q. Okay. You would not have deposited cash 11:33:40

1 GREGORY ANGLIN

2 into the account at [REDACTED] 11:33:43

3 A. I don't believe I ever did. 11:33:51

4 Q. What gives you certainty about that? 11:33:54

5 A. I don't have certainty about it. But I 11:33:58

6 just think that we were winding up that whole cash 11:34:00

7 thing. 11:34:05

8 Q. Sir, I don't understand what you mean by 11:34:13

9 winding up -- we were winding up that whole cash 11:34:15

10 thing. Who is the we? 11:34:18

11 A. We would be me. I just need to think for 11:34:21

12 just a minute. I'm sorry. 11:34:25

13 Q. Please. 11:34:26

14 A. Starting in March -- I just want to make 11:34:56

15 sure I understand the question completely. I'm 11:35:04

16 sorry, I think I'm getting a little bit tired here. 11:35:06

17 But go ahead. 11:35:08

18 Q. Certainly. I have no problem repeating 11:35:10

19 it, sir. 11:35:12

20 A. Okay. Thank you. I don't want to be 11:35:12

21 annoying to you. 11:35:14

22 Q. You're not annoying. 11:35:15

23 A. Okay. 11:35:16

24 Q. You deposited cash received to the P.O. 11:35:16

25 Box into [REDACTED] and then wrote a 11:35:18

1 GREGORY ANGLIN

2 corresponding check to Mr. Andrew Anglin for that 11:35:22

3 amount, correct? 11:35:26

4 A. That's correct. 11:35:26

5 Q. At some point in time, [REDACTED] 11:35:27

6 closed your accounts, correct? 11:35:30

7 A. That's correct. 11:35:32

8 Q. And so I would like to understand what you 11:35:33

9 did with the cash that came into the P.O. Box after 11:35:35

10 [REDACTED] closed your account. 11:35:38

11 A. I think I just let it sit until about 11:35:44

12 April of this year, 2018, when I was doing a real 11:35:51

13 estate rehab, and I borrowed some money from my son. 11:35:59

14 And so he had some cash that had accumulated. I 11:36:02

15 borrowed that money, and then I paid it back later in 11:36:06

16 the year. 11:36:08

17 Q. Okay. And what was the amount that you 11:36:09

18 borrowed in April of this year for the real estate 11:36:11

19 rehab? 11:36:13

20 A. I misspoke. Thank you. It was actually 11:36:14

21 last year, it was 2017. 11:36:17

22 Q. Okay. 11:36:20

23 A. I borrowed -- I know the exact amount -- I 11:36:21

24 borrowed \$60,038 from him early -- during the summer, 11:36:25

25 probably, of 2017. And then I deposited -- when I 11:36:31

1 GREGORY ANGLIN

2 paid him back at the end of 2017, I wrote him a 11:36:37
3 check. And I don't recall making any -- doing 11:36:40
4 anything with cash other than perhaps there was a few 11:36:43
5 hundred dollars that trickled in that were still in 11:36:46
6 an envelope of his. 11:36:49

7 Q. Okay. Let's sort of go over all those 11:36:51
8 pieces of information separately. 11:36:53

9 A. Okay. 11:36:55

10 Q. The \$60,000 loan you received, that was in 11:36:55
11 the form of cash that had accumulated and was left 11:37:01
12 undeposited? 11:37:04

13 A. I took it over time while I was doing 11:37:05
14 this. I underestimated how much money it would cost 11:37:07
15 to do this rehab. So I called Andrew and I said, can 11:37:15
16 I borrow some of this money for a few months, some of 11:37:19
17 your money. And he said sure. So I borrowed it, 11:37:22
18 like 5,000 here, 5,000 there. I never knew for sure 11:37:24
19 how much more I was going to need, but I would borrow 11:37:31
20 it from him, yes. 11:37:33

21 Q. How are you certain about the aggregate 11:37:35
22 amount? I believe you said \$60,038. 11:37:37

23 A. Yes, I was real careful. Andrew had an 11:37:40
24 envelope with foreign currency. Andrew had an 11:37:46
25 envelope with United States currency, and I had an 11:37:50

1 GREGORY ANGLIN

2 envelope. And when I took money in a loan from 11:37:54

3 Andrew, I would write it down on my envelope, the 11:37:57

4 date and the amount of money that I took. 11:38:00

5 Q. And these envelopes you're referencing in 11:38:02

6 your answers, where were they physically located? 11:38:04

7 A. They were located at a security box at [REDACTED] 11:38:11

8 [REDACTED] 11:38:22

9 Q. In whose name is the security box in? 11:38:22

10 A. In mine. 11:38:24

11 Q. Okay. And what is in the security box 11:38:26

12 today that relates to Mr. Andrew Anglin? 11:38:30

13 A. Some currency, I would guess -- I don't 11:38:35

14 know the exact amount. Most of it is foreign. About 11:38:40

15 \$2,000 would be my guess. I don't know. 11:38:43

16 Q. Of foreign currency? 11:38:46

17 A. That's correct. 11:38:49

18 Q. What's in the security box that relates to 11:38:49

19 Daily Stormer? 11:38:51

20 A. Nothing. 11:38:53

21 Q. What's in the security box that relates to 11:38:53

22 Moonbase? 11:38:55

23 A. Nothing. 11:38:56

24 Q. Other than the \$2,000 in foreign currency 11:38:57

25 is there anything else in the security box? 11:39:01

1 GREGORY ANGLIN

2 A. Some different personal possessions of 11:39:03
3 mine. 11:39:05

4 Q. When you paid back Mr. Andrew Anglin the 11:39:12
5 sum of \$60,038, was it a lump sum payment you made or 11:39:14
6 did you pay it incrementally? 11:39:21

7 A. A lump sum payment. 11:39:23

8 Q. How did you make that payment? 11:39:24

9 A. I wrote a check from [REDACTED] and deposited 11:39:26
10 it in his account. 11:39:30

11 Q. His account at [REDACTED]? 11:39:31

12 A. That's correct. 11:39:32

13 Q. And when did that occur? 11:39:33

14 A. December of last year, 2017. 11:39:36

15 Q. What is the last date in which you 11:39:38
16 deposited money into the [REDACTED] account for Mr. Andrew 11:39:41
17 Anglin? 11:39:44

18 A. I believe that was the last deposit. 11:39:46

19 Q. The 60,038? 11:39:48

20 A. Yes. Thank you. 11:39:52

21 Q. And the check that you wrote him was from 11:39:54
22 your account at [REDACTED] 11:39:55

23 A. That's correct. 11:39:57

24 Q. If we go back to Exhibit 8, sir, in the 11:40:00
25 upper right-hand corner it says Box Number 208. Is 11:40:03

1 GREGORY ANGLIN

2 that consistent with your recollection as to where 11:40:09
3 you received mail for Mr. Andrew Anglin? 11:40:10

4 A. Yes, it is. 11:40:13

5 Q. And did you have any assistance in filling 11:40:14
6 out this form? 11:40:17

7 A. I mean, it's possible that I asked a 11:40:22
8 question of the woman at the post office. I don't 11:40:24
9 recall. 11:40:27

10 Q. Other than asking the person at the post 11:40:28
11 office, do you recall asking for anyone else's 11:40:30
12 assistance in completing the form? 11:40:34

13 A. No, I did not. 11:40:37

14 Q. Did you get the form at the post office or 11:40:38
15 was it mailed to you? 11:40:40

16 A. I don't recall. 11:40:41

17 Q. Do you recall visiting the post office to 11:40:42
18 submit it? 11:40:45

19 A. I don't recall if I visited the post 11:40:51
20 office or -- my guess would be I dropped it off at 11:40:53
21 the post office, but I don't recall that act. 11:40:58

22 Q. If you look at item number one, it says: 11:41:00
23 This service is for (required selection), and the box 11:41:01
24 that is checked is business/organization use. Is 11:41:08
25 that correct? 11:41:12

1 GREGORY ANGLIN

2 A. That is correct. 11:41:12

3 Q. You checked that box? 11:41:13

4 A. Yes, I did. 11:41:14

5 Q. What business or organization were you 11:41:15
6 checking that box for? 11:41:17

7 A. I think the business organization is 11:41:20
8 Andrew Anglin. 11:41:22

9 Q. And is that an individual's name or is 11:41:24
10 that a business name? 11:41:27

11 A. I guess it's both. It's my son's name, 11:41:28
12 yeah. 11:41:31

13 Q. And then if you turn back to Exhibit 4, 11:41:32
14 sir, the trade name registration? 11:41:34

15 A. Right. 11:41:38

16 Q. On January 10th, 2017, you registered the 11:41:38
17 trade name Andrew Anglin on behalf of Moonbase 11:41:43
18 Holdings, LLC, is that correct? 11:41:46

19 A. Yeah, that's correct. 11:41:49

20 Q. And two days later on Exhibit 8 you open a 11:41:50
21 P.O. box on behalf of the trade name Andrew Anglin, 11:41:55
22 is that correct? 11:41:59

23 A. Yes, I think that was his plan, yes. 11:42:00

24 Q. And the plan that you're referencing is to 11:42:02
25 create a trade name for Moonbase Holdings called 11:42:08

1 GREGORY ANGLIN

2 Andrew Anglin, correct? 11:42:11

3 A. I don't know if it was for Moonbase 11:42:13

4 Holdings or how any of that works. This is just how 11:42:14

5 he asked me to set it up. 11:42:19

6 Q. If you look at the middle of Exhibit 4, 11:42:21

7 sir, you'll see it references Moonbase Holdings, LLC. 11:42:23

8 A. Um-hum. 11:42:27

9 Q. If you turn to the first page of Exhibit 4 11:42:28

10 under the column that says Name of Registrant it says 11:42:30

11 Moonbase Holdings, LLC, correct? 11:42:33

12 A. That's correct. 11:42:36

13 Q. And you knew that at the time you 11:42:36

14 submitted this form on January 10, 2017, right? 11:42:38

15 A. Yeah, yeah. 11:42:42

16 Q. If you turn back to Exhibit 8, the name of 11:42:43

17 the person who was applying for the P.O. Box on 11:42:49

18 behalf of trade name Andrew Anglin is yourself, 11:42:52

19 Gregory Anglin, correct? 11:42:57

20 A. Yes, that's correct. 11:42:59

21 Q. And the address listed is your office 11:42:59

22 address, is that correct? 11:43:02

23 A. That's correct. 11:43:02

24 Q. And the phone number listed is your phone 11:43:02

25 number, correct? 11:43:04

1 GREGORY ANGLIN

2 A. That's correct. 11:43:05

3 Q. And the email address listed is your email 11:43:05
4 address, right? 11:43:08

5 A. That is correct. 11:43:09

6 Q. And under Photo I.D., you've checked Valid 11:43:10
7 Driver's License, is that right? 11:43:15

8 A. That's correct. 11:43:17

9 Q. And the Photo I.D. number there, is that a 11:43:17
10 reflection of your Driver's I.D. number? 11:43:21

11 A. I would presume it is. 11:43:23

12 Q. Okay. And then there's a reference to 11:43:25
13 home or vehicle insurance policy. Is that your home 11:43:27
14 or vehicle insurance policy? 11:43:30

15 A. Yes, it would be. 11:43:31

16 Q. Okay. And other than yourself, who else 11:43:32
17 was authorized to receive mail at the P.O. box? 11:43:35

18 A. Well, I think the next page says just me. 11:43:38

19 Q. Was Mr. Andrew Anglin, your son, the 11:43:42
20 individual, was he authorized to receive mail at the 11:43:45
21 P.O. box? 11:43:49

22 A. No, he was not. 11:43:49

23 Q. He was not allowed to pick it up? 11:43:50

24 A. You have to register that in person, and 11:43:53
25 he was never in the United States. 11:43:57

1 GREGORY ANGLIN

2 deposit box of which you're aware? 11:46:10

3 A. I'm only aware of one. 11:46:13

4 Q. And when did you open that safety deposit 11:46:15

5 box? 11:46:17

6 A. When I opened the account at that bank, so 11:46:24

7 I think that was sometime late in 2017. 11:46:28

8 Q. Okay. Did you previously have a safety 11:46:32

9 deposit box at [REDACTED] 11:46:35

10 A. Yes, I did. 11:46:38

11 Q. Do you still have that? 11:46:39

12 A. No, I do not. 11:46:40

13 Q. When your accounts at [REDACTED] were 11:46:41

14 closed was the safety deposit box closed as well? 11:46:42

15 A. I closed it. They didn't ask me to close 11:46:47

16 it. 11:46:49

17 Q. You referenced earlier, sir, an envelope 11:46:50

18 on which you tracked the amount of money that you 11:46:53

19 were borrowing from your son. Does that envelope 11:46:56

20 still exist? 11:47:01

21 A. No. 11:47:01

22 Q. What happened to it? 11:47:02

23 A. That would have been thrown away when I 11:47:03

24 paid the 60,038 back. 11:47:06

25 Q. Did you pay back exactly \$60,038 or did 11:47:08

1 GREGORY ANGLIN

2 you pay any interest? 11:47:12

3 A. I did not pay interest, no. 11:47:14

4 Q. Have you borrowed any other sums from your 11:47:22

5 son? 11:47:24

6 A. No. 11:47:24

7 Q. On Item 2 for Exhibit 8, when you listed 11:47:33

8 Andrew Anglin, did you intend to denote your son, the 11:47:36

9 individual, or did you intend to denote the trade 11:47:43

10 name that was registered by Moonbase Holdings on 11:47:47

11 January 10th, 2017? 11:47:50

12 A. I didn't really have any intent either 11:47:53

13 way. I filled out the form the way that Andrew 11:47:55

14 Anglin asked me to. 11:47:58

15 Q. Okay. You checked the box 11:47:59

16 business/organization use -- 11:48:00

17 A. That's correct. 11:48:02

18 Q. -- rather than residential. 11:48:02

19 Did he tell you to do that? 11:48:04

20 A. He told me that I have to do that 11:48:06

21 because -- yes, he told me to do that. 11:48:08

22 Q. And did he have a copy of the form? 11:48:12

23 A. Apparently. 11:48:14

24 Q. Who sent it to him? 11:48:15

25 A. I didn't send it to him. I don't know. 11:48:17

1 GREGORY ANGLIN

2 Q. Were you talking to him on the phone while 11:48:19
3 you were filling out the form? 11:48:21

4 A. I don't remember. 11:48:29

5 Q. Do you still receive mail at 208? 11:48:42

6 A. Mail still goes to P.O. Box 208. I don't 11:48:48
7 collect it any longer. 11:48:51

8 Q. Who collects it? 11:48:53

9 A. Nobody to my knowledge. 11:48:54

10 Q. And when did you stop collecting mail at 11:48:55
11 P.O. Box 208? 11:48:57

12 A. I'm bad at time frames. Maybe a couple 11:49:03
13 months ago. 11:49:05

14 Q. Why did you make that decision? 11:49:05

15 A. I just didn't want to do it any more. 11:49:07

16 Q. Do you know if the P.O. Box still contains 11:49:11
17 cash contributions? 11:49:15

18 A. There had not been cash contributions for 11:49:17
19 quite a long time, so I would be surprised. 11:49:19

20 Q. But you don't know, because you haven't 11:49:24
21 visited the P.O. box? 11:49:26

22 A. That's correct. 11:49:28

23 (Plaintiff's Exhibit 9 was marked for 11:49:28
24 identification.) 11:49:28

25 Q. Okay. Mr. Anglin, I'm handing you a 11:49:32

1 GREGORY ANGLIN

2 information. 12:08:04

3 A. Yes, sir. 12:08:04

4 Q. Sir, you talked about the loan that was 12:08:05

5 made to you from funds sent to Andrew Anglin the 12:08:09

6 \$60,038? 12:08:13

7 A. Um-hum. 12:08:15

8 Q. And you referenced a real estate rehab 12:08:15

9 project, is that correct? 12:08:19

10 A. That's correct. 12:08:20

11 Q. Was that rehab project related in any way 12:08:20

12 related to Mr. Andrew Anglin? 12:08:23

13 A. No, it was not. 12:08:24

14 Q. Related in any way to Moonbase Holdings? 12:08:26

15 A. No, it was not. 12:08:28

16 Q. Was it related to Daily Stormer? 12:08:29

17 A. No, it was not. 12:08:31

18 Q. Was it associated with your personal 12:08:32

19 business affairs? 12:08:34

20 A. Yes, sir, it was. 12:08:35

21 Q. And was that real estate rehab associated 12:08:36

22 with property here in Columbus, Ohio? 12:08:39

23 A. Yes, it was. 12:08:41

24 Q. Is that project complete? 12:08:44

25 A. Yes, sir, it is, finally. 12:08:46

1 GREGORY ANGLIN

2 121, Worthington, Ohio?

12:16:17

3 A. Yes, I see that.

12:16:19

4 Q. And on top of that it says, "And snail

12:16:20

5 mail for cash (any currency), checks, money orders,

12:16:22

6 and so on." Is that what it says?

12:16:29

7 A. That is what it says.

12:16:32

8 Q. And underneath it lists the address

12:16:33

9 associated with your consulting business, correct?

12:16:35

10 A. That's correct.

12:16:39

11 Q. We talked about cash, and we talked about

12:16:41

12 foreign currency. We didn't talk about money orders.

12:16:43

13 Did you ever receive money orders at that address?

12:16:47

14 A. Yes, I did.

12:16:49

15 Q. And how did you treat those?

12:16:50

16 A. Well, just like a check.

12:16:53

17 Q. You would deposit them into the [REDACTED]

12:16:56

18 account?

12:16:59

19 A. That's correct.

12:16:59

20 Q. Or on occasion you would deposit them into

12:17:00

21 your [REDACTED] account and then send a check to

12:17:02

22 Mr. Anglin for the corresponding amount?

12:17:06

23 A. Well, only with cash.

12:17:08

24 Q. You would only do that with cash?

12:17:09

25 A. That's correct.

12:17:13

1 GREGORY ANGLIN

2 Daily Stormer website? 12:20:10

3 A. No, I don't. 12:20:13

4 Q. Do you know if people who write for the 12:20:15

5 Daily Stormer get paid? 12:20:17

6 A. No, I don't know. 12:20:19

7 Q. Do you have any understanding as to what 12:20:24

8 happens to the money that is contributed to the Daily 12:20:25

9 Stormer? 12:20:27

10 A. No, I don't. 12:20:31

11 Q. Did you ever ask Andrew Anglin that 12:20:32

12 question? 12:20:35

13 A. No, I did not. 12:20:35

14 Q. You were depositing money in to his 12:20:38

15 account, correct? 12:20:41

16 A. I deposited money in to his account, yes, 12:20:44

17 sir. 12:20:46

18 Q. And you collected money from the P.O. box? 12:20:47

19 A. That's correct. 12:20:49

20 Q. You collected money from the 6827 North 12:20:49

21 High Street address? 12:20:52

22 A. That's correct. 12:20:53

23 Q. And you never asked him what's this money 12:20:54

24 for? 12:20:55

25 A. No, I never had a conversation with him 12:20:58

1 GREGORY ANGLIN

2 except before I borrowed the money, I asked him -- I 12:21:00
3 just confirmed again, I said, this is your money. He 12:21:11
4 said this is my money. 12:21:14

5 Q. And did you have an understanding 12:21:15
6 independent of any conversation you might have had 12:21:18
7 with him as to what the purpose of these 12:21:21
8 contributions that were coming into these addresses 12:21:24
9 was? 12:21:27

10 A. What the -- the purpose meaning why they 12:21:31
11 sent them or what they were supposed to do -- what he 12:21:34
12 was supposed to do with the money? 12:21:36

13 Q. We can talk about both. Let's talk about 12:21:38
14 the first concept first. Why do you understand 12:21:40
15 people were sending money? 12:21:42

16 A. I think it was primarily readers of the 12:21:44
17 site that were sending him money. 12:21:47

18 Q. The Daily Stormer website? 12:21:50

19 A. That is correct, readers of the Daily 12:21:52
20 Stormers website were sending Andrew money. 12:21:54

21 Q. And what about the second question, what 12:21:58
22 was going to be done with the money; what did you 12:21:59
23 understand to happen? 12:22:01

24 A. You know, I don't know what he does with 12:22:02
25 his money. 12:22:03

1 GREGORY ANGLIN

2 Q. And did you have any belief or opinion as 12:22:04
3 to what was going to occur with the funds that were 12:22:07
4 sent to the addresses we've talked about today? 12:22:10

5 A. No, I did not. 12:22:13

6 Q. Sir, are you paying your own legal fees in 12:22:21
7 connection with this deposition? 12:22:26

8 A. Yes, I am. 12:22:27

9 Q. Do you intend to seek reimbursement from 12:22:28
10 your son? 12:22:30

11 A. No, I do not. 12:22:30

12 MR. QURESHI: I have no further questions. 12:22:35

13 [REDACTED] Thank you. 12:22:37

14 MR. QURESHI: Thank you for your time, 12:22:38

15 Mr. Anglin. 12:22:40

16 THE VIDEOGRAPHER: It's 12:21, we're off 12:25:44
17 the record. 12:25:44

18 (Signature Not Waived.) 12:25:44

19 - - - 12:25:44

20 (DEPOSITION CONCLUDED AT 12:21 P.M.) 12:25:44

1 GREGORY ANGLIN

2 CERTIFICATE

12:25:44

3 State of Ohio :

12:25:44

SS:

12:25:44

4 County of Franklin:

5 I, Jackie Olexa White, Notary Public in
6 and for the State of Ohio, duly commissioned and
7 qualified, certify that the within named GREGORY
8 ANGLIN was by me duly sworn to testify to the whole
9 truth in the cause aforesaid; that the testimony was
10 taken down by me in stenotypy in the presence of said
11 witness, afterwards transcribed upon a computer; that
12 the foregoing is a true and correct transcript of the
13 testimony given by said witness taken at the time and
14 place in the foregoing caption specified.

15 I certify that I am not a relative,
16 employee, or attorney of any of the parties hereto,
17 or of any attorney or counsel employed by the
18 parties, or financially interested in the action.

19 IN WITNESS WHEREOF, I have set my hand and
20 affixed my seal of office at Columbus, Ohio, on this
21 13th day of November, 2018.

22
23 _____
JACKIE OLEXA WHITE, Notary Public
in and for the State of Ohio
24 and RPR-CM.

25 My Commission expires January 21, 2019.